

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

VENISE THERESA GONYA, as representative)	
of the Estate of Joseph E. Gonya, deceased)	
individually and on behalf of all others similarly)	
situated,; ROXANNE S. SCAIFE, as)	
representative of the Estate of Arnold L. Stone,)	
deceased, individually and on behalf of all others)	
similarly situated,)	CIVIL ACTION NO.: C-04-221-M
)	
)	
Plaintiffs,)	ASSENTED TO MOTION TO ADMIT
)	ATTORNEYS <i>PRO HAC VICE</i>
)	(PURSUANT TO LR 83.2(b))
vs.)	
)	
ROGER A. SEVIGNY, Commissioner of the)	
State of New Hampshire Insurance Department,)	[CLASS ACTION]
in his official capacity as Insurance Commissioner)	
and liquidator of The Home Insurance Company;)	
PETER W. HEED, Attorney General of New)	
Hampshire, in his official capacity,)	
)	
Defendants.)	
_____)	

NOW COME Venise Theresa Gonya and Roxane S. Scaife, Plaintiffs in the above-entitled matter, by and through their attorneys, Watson & Lemire, P.A. and respectfully request that this Court permit the admission *pro hac vice* of Attorneys Alan Rich and Stephen Blackburn of the firm of Baron & Budd, P.C. in this action. In support of this motion, the plaintiffs state as follows:

1. The Plaintiffs have retained the firm of Baron & Budd, P.C., 3102 Oaklawn Avenue, Suite 1100, Dallas, Texas 75219-4281 to represent them in claims for injuries and other damages caused by tortious acts committed by entities insured or believed to be insured by The Home

Insurance Company or its subsidiaries. The Home Insurance Company is being liquidated by the State of New Hampshire Insurance Department.

2. Attorney Alan Rich is a member in good standing of the bars of the states of Texas and Illinois. He is also admitted and in good standing before the United States Supreme Court, the United States Court of Appeals for the Third, Fifth and Ninth Circuits, United States District Courts for the Northern District of Texas, Southern District of Texas, Eastern District of Texas, Western District of Texas and Northern District of Illinois, the United States Tax Court and the United States Court of Federal Claims. See attached Affidavit of Alan Rich.

3. Attorney Stephen Blackburn is a member in good standing of the bars of the state of Texas and the United States District Court for the Northern District of Texas. See attached Affidavit of Stephen Blackburn.

4. In accordance with LR 83.2(b), the undersigned attorneys shall at all times be associated with Messrs. Rich and Blackburn in this action and shall in all respects comply with the provisions of that rule.

MEMO STATEMENT, LR 7.1(a)(2)

5. Authority for this Motion is found at LR 83.2(b). A memorandum with additional citations is unnecessary with respect to the filing of this Motion.

CONCURRENCE STATEMENT, LR 7.1(c)

6. Counsel for the defendant has been apprised of this Motion and has indicated his assent to the granting of the relief sought herein.

WHEREFORE, the plaintiffs respectfully pray that this Court:

A. Permit the *pro hac vice* admission of Attorneys Alan Rich and Stephen Blackburn;
and

B. Grant such other and further relief as the Court may deem just.

Dated: July __, 2004

Respectfully submitted,
Venice Theresa Gonya and
Roxanne S. Scaife, Plaintiffs
By their attorneys
WATSON & LEMIRE, P.A.

By: _____
Thomas R. Watson, Esq. NH Bar #2670
Jennifer A. Lemire, Esq. NH Bar #11316
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion to Admit Attorneys *Pro Hac Vice* was on this date mailed, postage prepaid, to Daniel J. Mullen, Esquire, Associate Attorney General, counsel for Defendants.

Dated: July __, 2004

Thomas R. Watson, Esq.